

# **EXHIBIT G**

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Volume III  
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UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. NO. 03-12551-NG

FRANK SACO,	:
Plaintiff,	:
vs.	:
TUG TUCANA and	:
TUG TUCANA CORPORATION,	:
Defendants.	:

CONTINUED DEPOSITION of FRANK SACO, taken on behalf of the Defendants, pursuant to the applicable provisions of the Massachusetts Rules of Civil Procedure, before Barbara M. Montijo, a Registered Professional Reporter and Notary Public within and for the Commonwealth of Massachusetts, at the offices of Clinton & Muyzka, P.C., One Washington Mall, Boston, Massachusetts, on October 30, 2006, commencing at 2:00 p.m.

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1           catering job and she might have me do some  
2           cooking for her at home. I have a friend that  
3           paints a little. If he's got something I can do  
4           on my own time, he'll say I've got a bunch of  
5           shutters, take your time, sit down, do whatever  
6           you want, paint them. It's a few hours a  
7           month. It's just been the last four months,  
8           since May. About five, six months. It's not  
9           something I count on. I haven't done it in the  
10          last four to five weeks with him now.

11 Q. When you say the last four or five months,  
12        that's just for the painting?

13 A. Yeah.

14 Q. What about the catering jobs?

15 A. The same thing. It's not a catering job. I've  
16        done two jobs in the last six months with her,  
17        all right. So, I earned a couple of couple of  
18        hundred bucks.

19 Q. Does she have her own business?

20 A. No. She used to have her own business. Now,  
21        she cooks for these wealthy families and people  
22        will call her and ask her to do a function on  
23        occasion.

24 Q. Did you have any work before May of 2006?

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1 A. Yeah, somebody -- a friend of mine had a job  
2 with him, recommended me. He said he needed  
3 someone. I called him. He called me in for an  
4 appointment, interview. I filled out an app and  
5 I haven't heard anything from him in over two  
6 months, two-and-a-half months. I called him  
7 like three or four times, left messages. He  
8 called me once, maybe twice. He hasn't called  
9 me in the last ten weeks.

10 Q. Is that the only other job you've sought out?

11 A. It's the only one I thought I'd be able to do.  
12 It was 11 at night to 7 in the morning  
13 sitting in my car. I think it was like three  
14 shifts a week.

15 Q. I think in your first deposition, way back  
16 when, in April of '04, you talked about how you  
17 used to drive a cab?

18 A. Yeah, in 1957. When I first got married. '59.

19 Q. But you can't drive a cab now?

20 A. I could. Sure, I could. If you can find me a  
21 job. As far as lugging groceries and stuff, you  
22 know...

23 Q. Have you tried to find another job other than  
24 with Minuteman Security?

1 A. I've been looking.

2 Q. Where have you been looking? What type of jobs?

3 A. Oh, just in the newspapers. Anything that I  
4 thought I could do. Anything that I thought  
5 would fit. You know, when you're 66, there's  
6 really not too many things available to you.

7 I'm not college educated. I'm a fisherman.

8 Q. Have you ever sought out a job as a barber?

9 A. I'd need to go back to school. I looked into  
10 that.

11 Q. What did you discover through that  
12 investigation?

13 A. I needed to go back to school and get my license  
14 reinstated. And I don't -- I'd have to do it on  
15 a very limited basis. Because I do it at home  
16 with my friends and my grandchildren now.  
17 Obviously, I don't charge them, you know, one or  
18 two haircuts here and there.

19 Q. Does your friend's painting company have a  
20 name?

21 A. Cross, C-R-O-S-S.

22 Q. What's your friend's name?

23 A. George Cross.

24 Q. Is he out of Manchester?

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1 A. No, he lives in Danvers.

2 Q. When was the last time you worked for George  
3 Cross?

4 A. Today's Monday. I think four weeks ago today.  
5 I worked one day that week, yeah.

6 Q. Is that when you painted the shutters?

7 A. No, I didn't do shutters. I was -- let me  
8 think. I was doing -- I'm almost positive I was  
9 doing balusters on a porch.

10 Q. Have you had any work since --

11 A. No.

12 Q. -- working for him?

13 A. No.

14 Q. And just for the sake of completion. What's  
15 your girlfriend's name?

16 A. She's not really my girlfriend. She's a very  
17 close friend. Jane Pearson, P-E-A-R-S-O-N.

18 Q. What's Ms. Pearson's company's name?

19 A. It's -- well, she used to be Creative Catering.  
20 Now, she doesn't have a company. She works for  
21 other people on the side if somebody calls her  
22 to do a job.

23 Q. Is she retired now?

24 A. No, she works. She's self-employed. She works

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1           for -- she prepares meals for some wealthy  
2           people.

3   Q.   So, she's a freelance type of person?

4   A.   Yes.

5   Q.   When's the last time you worked with  
6           Ms. Pearson?

7   A.   Six to eight weeks ago.

8   Q.   She's also in Manchester?

9   A.   Yes.

10   Q.   Now, also on the papers that were submitted to  
11       the court, you mentioned, or your counsel or  
12       yourself submitted that you averaged \$100 a week  
13       for food; is that correct?

14   A.   Pretty much, yeah.

15   Q.   Is this food for yourself, or do you share it  
16       with your mom?

17   A.   Well, if it's there and my mother wants it, I'm  
18       not going to deny it to her.

19   Q.   Fair enough.

20   A.   Or anybody else that comes in the house.

21   Q.   And again, how did you come up with the \$100  
22       average?

23   A.   I just tried to figure what I spend. 30 here,  
24       40 there.